

Patrick D. McBurney, Jr.
Attorney at Law
6855 W. Clearwater Ave., Suite A103
Kennewick, WA 99336
Tel: (509) 374-8996
Fax: (509) 374-1296

Hon. Whitman L. Holt
Ch 7

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

In re:)	
)	
SOLEADOS ESTATES, LLC,)	NO. 23-00196-WLH7
)	
)	DECLARATION OF JOHN A. SULLINS
)	RE: MOTION FOR CONTEMPT AND DAMAGES
Debtor(s).)	FOR VIOLATIONS OF AUTOMATIC STAY
)	

I John A. Sullins, declare as follows:

1. I am the managing member for the LLC debtor above named. I am over the age of 18 and competent to make this declaration.
2. I am the managing member of the following entities, which are presently in bankruptcy:

Sullinair Jet Center, LLC, Cause No. 22-00933-WLH7;
Pasco FBO Partners, LLC, Cause No. 22-00934-WLH7; and
Soleados Estates, LLC, Cause No. 23-00196-WLH7.
3. Spartan Business Solutions, LLC is a creditor of Sullinair Jet Center, LLC, and Pasco FBO Partners, LLC, Cause No. 22-00934-WLH7, Spartan Business Solutions, LLC was listed as a creditor in those bankruptcies. Both of those cases were filed on October 12, 2022.
4. I borrowed merchant capital from Spartan Business Solutions, LLC. I assert that Soleados Estates was never a debtor of Spartan Business Solutions, LLC. I do not recall ever encumbering myself personally or Soleados Estates to Spartan Business Solutions, LLC.
5. On November 17, 2022, Spartan Business Solutions, LLC obtained a default Judgment against Sullinair Jet Center, LLC, Soleados Estates, LLC, Pasco FBO Partners, LLC; Asi Es La Vida, LCC; Capital Strategies and Developing, LLC, Rentalfleet, LLC and myself

DECLARATION OF JOHN A. SULLINS
IN SUPPORT OF MOTION AND DAMAGES - 1

Patrick D. McBurney
ATTORNEY AT LAW

1 personally, in the Supreme Court of New York in Monroe County under Cause No.
2 E2022008026. I have never seen a summons or complaint, and I was never served either
3 personally or by mail. The first time I became aware of this action was when I received a
4 copy of the notice of the recording of the foreign Judgment in King County, WA.

5 6. On February 27, 2023, I filed for bankruptcy protection for Soleados Estates, LLC,
6 because Kohne Investments, LLC had had sued Sullinair Jet Center, LLC, Pasco FBO
7 Partners, LLC, and Soleados Estates, LLC in Benton County Superior Court in Cause No.
8 20-2-00813-03. Karl Kohne as Trustee of the Kohne QRP also sued Sullinair Jet Center,
9 LLC, Pasco FBO Partners, LLC, and Soleados Estates, LLC in Cause No. 20-2-00814-03.

10 7. In one of those cases, Mr. Kohne had obtained a judgment which led to a Sheriff's sale of
11 the fuel tanks at the Pasco Airport, which had caused me to file for bankruptcy in October
12 for Sullinair Jet Center, LLC and Pasco FBO Partners, LLC. However, at that time I did
13 not file bankruptcy for Soleados Estates because they were not part of the FBO business.
14 Soleados Estates was a real estate development company, and it ceased doing business in
15 2021. Because I had not filed for bankruptcy, Mr. Kohne had ordered me to appear and
16 show cause for a supplemental proceeding. I filed bankruptcy for Soleados Estates, LLC
17 to resolve that case. I did not believe Spartan Business Solutions, LLC to be a creditor to
18 Soleados Estates, LLC.

19 6. I received notice of the recording of the foreign judgment in the mail. I brought that
20 document to my attorney (The Notice and Declaration For Filing Foreign Judgment is
21 attached and herein incorporated by reference as - Exhibit A), who then called Matthew
22 D. Green, Spartan Business Solutions, LLC's counsel. Mr. McBurney expressed his
23 concern that filing the New York Judgment in King County Superior Court could
24 constitute a stay violation. Mr. Green advised my attorney that his position was that Mr.
25 Sullins had not personally filed bankruptcy and therefore his client could pursue
26 collection actions against him. Mr. McBurney raised the issue of service. Mr. Green
27 advised that service by first class mail was permissible in New York State.
28 Notwithstanding, that I never received any mail regarding that case until the Foreign
Judgment was recorded in King County.

7. Subsequent to Mr. McBurney's conversation with Mr. Green. I received in the mail the
following:

DECLARATION OF JOHN A. SULLINS
IN SUPPORT OF MOTION AND DAMAGES - 1

Patrick D. McBurney
ATTORNEY AT LAW

1 Application for a Writ of Garnishment naming Numerica CU as Garnishee
2 defendant (attached and herein incorporated by reference as Exhibit B);

3 A Writ of Garnishment (attached and herein incorporated by reference as Exhibit
4 C); and

5 A subpoena to Numerica for bank records for Soleados Estates and other entities
6 (attached and herein incorporated by reference as Exhibit D).

7
8 8. Numerica CU is where my business bank account was for Sullinair Jet Center, LLC. This
9 was the account that Spartan Business Solutions had been taking automatic withdrawals
10 from and that account was at Numerica CU.

11 9. Nothing on the documents submitted to Numerica CU indicates that that Spartan
12 Business Systems, LLC is not collecting a debt as to Sullinair Jet Center, LLC, Pasco
13 FBO Partners, LLC, Soleados Estates, LLC. These actions are clear violations of the
14 automatic stay. Spartan Business Systems, LLC, should have reasonably known it was
15 engaging in willful violations of the automatic stay. It should be sanctioned accordingly.
16 A Statement of Damages and Attorney's Fees is attached and herein incorporated by
17 reference as Exhibit E.

18 I DECLARE UNDER THE LAWS OF THE STATE OF WASHINGTON UNDER PENALTY
19 OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

20 Signed: this April 13, 2023, at Kennewick, WA.

21 
22 _____
23 John A. Sullins - Declarant
24
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28

DECLARATION OF JOHN A. SULLINS
IN SUPPORT OF MOTION AND DAMAGES - 1

Patrick D. McBurney

ATTORNEY AT LAW

6855 W. Clearwater Ave., Suite A103, Kennewick, WA 99336
TEL: (509) 374-8996 Fax: (509) 374-9966

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7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 SPARTAN BUSINESS SOLUTIONS, LLC
9 d/b/a SPARTAN CAPITAL,

10 Plaintiff,

11 v.

12 SULLINAIR JET CENTER, LLC d/b/a
13 SULLINAIR JET CENTER; SOLEADOS
14 ESTATES, LLC; PASCO FBO PARTNERS,
15 LLC; ASI ES LA VIDA, LLC; CAPITAL
16 STRATEGIES & DEVELOPING, LLC;
17 RENTAFLEET, LLC; and JOHN A. SULLINS,

18 Defendants.

NO. 23-2-04552-1 SEA

NOTICE AND DECLARATION FOR
FILING FOREIGN JUDGMENT

(Clerk's Action Required)

19 TO: DEFENDANTS

20 I. I am an attorney for the Judgment Creditor herein, have personal knowledge of
21 the matters herein, and/or have reviewed plaintiff's business records maintained in the ordinary
22 course and am competent to testify. This declaration is made pursuant to RCW 6.36.035.

23 Judgment Debtors Names and Addresses:

24 John A. Sullins; Soleadas Estates, LLC; ASI ES La Vida, LLC; Capital Strategies &
25 Developing, LLC; and Rentafleet, LLC
93006 East Chelsea Road
Kennewick, WA 99338

NOTICE AND DECLARATION FOR FILING FOREIGN
JUDGMENT - I

2178-101

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

Met @ Green & Norwood PLLC

SCANNED

EXHIBIT "A"

1 Judgment Creditor's Name and Address:
2 Spartan Business Solutions, LLC d/b/a Spartan Capital
3 c/o Jason A. Gang, Esq.
4 1245 Hewlett Plaza. #478
5 Hewlett, NY 11557

6 2. All communications and/or correspondence with Judgment Creditor should be
7 sent to:

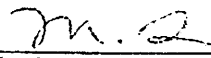
8 Green & Norwood PLLC
9 Attention: Matthew D. Green and
10 Elizabeth Hebener Norwood
11 2284 W. Commodore Way, Suite 300
12 Seattle, WA 98199
13 Email: matt@gnlawseattle.com
14 elizabeth@gnlawseattle.com

15 3. This declaration is made in reference to the filing of a foreign judgment against
16 Defendants above-named with the above-entitled Court. The judgment was initially entered on
17 November 17, 2022, under Cause No. E2022008026 in and from the Supreme Court of the
18 State of New York. County of Monroe, in the amount of \$40,172.65, plus post-judgment
19 interest at the rate of 9% per annum pursuant to New York law – NY CPLR 5004. An
20 exemplified copy of the judgment is attached hereto.

21 4. The judgment expires on November 16, 2032 (10-years from date of entry,
22 unless timely renewed/extended) in accordance with New York law.

23 I declare under penalty of perjury under the laws of the State of Washington that the
24 foregoing is true and correct.

25 Signed at Seattle, Washington, this 13th day of March, 2023.


Matthew D. Green

NOTICE AND DECLARATION FOR FILING FOREIGN
JUDGMENT - 2

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

2178-101

The People of the State of New York

BY THE GRACE OF GOD FREE AND INDEPENDENT

all to whom these presents shall come or may concern, Greetings:

. That we, having examined the Records and files in the office of the

Clerk of the County of Monroe, of the County
Court of said County, and of the Supreme
Court of Said State in and for said County, do
find there remaining on file or entered a certain

Judgment

in an action wherein

SPARTAN BUSINESS SOLUTIONS, LLC D/B/A SPARTAN CAPITAL, plaintiffs, and
SULLINAIR JET CENTER LLC D/B/A SULLINAIR JET CENTER, SOLEADOS
ESTATES, LLC, PASCO FBO PARTNERS LLC, ASI ES LA VIDA, LLC, CAPITAL
STRATEGIES AND DEVELOPING LLC, RENTAFLEET LLC, and JOHN A SULLINS,
defendants, and the words and figures following, to wit:

X
X
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X



Office of the County Clerk
MONROE COUNTY, NEW YORK

MONROE COUNTY CLERK'S OFFICE

THIS IS NOT A BILL. THIS IS YOUR RECEIPT.

Receipt # 3257777

Book Page

No. Pages: 3

Instrument: JUDGMENT

Control #: 202211170921

Index #: E2022008026

Date: 11/17/2022

Time: 2:28:55 PM

Spartan Business Solutions LLC

Sullinair Jet Center LLC
Sullinair Jet Center
Soleados Estates LLC
Pasco Fbo Partners LLC
Asi Es La Vida LLC

Judgment Filing Fee \$45.00

Total Fees Paid: \$45.00

Employee: CW

State of New York

MONROE COUNTY CLERK'S OFFICE
WARNING - THIS SHEET CONSTITUTES THE CLERKS
ENDORSEMENT, REQUIRED BY SECTION 317-a(5) &
SECTION 319 OF THE REAL PROPERTY LAW OF THE
STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

JAMIE ROMEO

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE

SPARTAN BUSINESS SOLUTIONS, LLC
D/B/A SPARTAN CAPITAL

Plaintiff,

-against-

SULLINAIR JET CENTER LLC
D/B/A SULLINAIR JET CENTER,
SOLEADOS ESTATES, LLC,
PASCO FBO PARTNERS LLC,
ASI ES LA VIDA, LLC,
CAPITAL STRATEGIES AND DEVELOPING LLC,
RENTAFLEET LLC, and JOHN A SULLINS

Defendants.

Index No. E2022008026

JUDGMENT

The Plaintiff, SPARTAN BUSINESS SOLUTIONS, LLC D/B/A SPARTAN CAPITAL, having commenced this action by its attorney, The Law Office of Jason Gang, PLLC, by filing a summons and complaint with the court on 10/6/2022. Service was effectuated upon the Defendants, SULLINAIR JET CENTER LLC D/B/A SULLINAIR JET CENTER, SOLEADOS ESTATES, LLC, PASCO FBO PARTNERS LLC, ASI ES LA VIDA, LLC, CAPITAL STRATEGIES AND DEVELOPING LLC, RENTAFLEET LLC, and JOHN A SULLINS on 10/6/2022. Plaintiff has proceeded in this action through their attorney, The Law Office of Jason Gang, PLLC, by Jason A. Gang, Esq. The time of the Defendants SULLINAIR JET CENTER LLC D/B/A SULLINAIR JET CENTER, SOLEADOS ESTATES, LLC, PASCO FBO PARTNERS LLC, ASI ES LA VIDA, LLC, CAPITAL STRATEGIES AND DEVELOPING LLC, RENTAFLEET LLC, and JOHN A SULLINS to appear and answer herein has expired and that said Defendants have not appeared or answered herein.

NOW, on motion of The Law Office of Jason Gang, PLLC, located at 1245 Hewlett Plaza, #478, Hewlett, NY 11557, attorneys of record for the Plaintiff herein, it is ADJUDGED:

That Plaintiff, SPARTAN BUSINESS SOLUTIONS, LLC D/B/A SPARTAN CAPITAL, 371 East Main St, Ste. 2, Middletown, NY 10940 shall recover of the Defendants, SULLINAIR JET CENTER LLC D/B/A SULLINAIR JET CENTER, SOLEADOS ESTATES, LLC, PASCO FBO PARTNERS LLC, ASI ES LA VIDA, LLC, CAPITAL STRATEGIES AND DEVELOPING LLC, RENTAFLEET LLC., residing at 3702 North Stearman Avenue, Pasco, WA 99301, and JOHN A SULLINS, residing at 93006 E Chelsea Rd, Kennewick, WA 99338, the sum of \$29,530.75, plus attorneys fees at the rate of 33.00% equaling \$9,745.15, plus interest from 10/6/2022 at the rate of 9.00% equaling \$406.75, plus costs and disbursements of \$490.00, in all totaling \$40,172.65 and that the Plaintiff have execution thereof.

Dated: Rochester, New York

NOV. 17, 2022

James P. Mello

ENTERED: 11/17/22

total taxed
@ 490
① special
deputy

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SPARTAN BUSINESS SOLUTIONS, LLC
d/b/a SPARTAN CAPITAL,

Plaintiff,

v.

SULLINAIR JET CENTER, LLC d/b/a
SULLINAIR JET CENTER; SOLEADOS
ESTATES, LLC; PASCO FBO PARTNERS,
LLC; ASI ES LA VIDA, LLC; CAPITAL
STRATEGIES & DEVELOPING, LLC;
RENTAFLEET, LLC; and JOHN A. SULLINS,

Defendants.

NO. 23-2-04552-1 SEA

FOREIGN JUDGMENT SUMMARY

(Clerk's Action Required)

I. JUDGMENT SUMMARY

Pursuant to RCW 4.64.030 and RCW 6.36.035 this foreign Judgment shall be
summarized as follows:

- | | |
|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| 1. Judgment Creditor: | SPARTAN BUSINESS SOLUTIONS, LLC
d/b/a SPARTAN CAPITAL |
| 2. Attorney for Judgment Creditor: | Matthew D. Green/Elizabeth Hebener
Norwood of Green & Norwood PLLC |
| 3. Judgment Debtors: | JOHN A. SULLINS; SOLEADOS
ESTATES, LLC; ASI ES LA VIDA, LLC;
CAPITAL STRATEGIES &
DEVELOPING, LLC; and RENTAFLEET,
LLC |

FOREIGN JUDGMENT SUMMARY - 1

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4. Principal Judgment Amount: \$29,530.75
5. Prejudgment Interest: \$406.75
6. Legal Fees: \$9,745.15
7. Costs: \$490.00
8. Costs per RCW 6.36 et seq.: \$240.00
9. Judgment Amount shall
Accrue Interest at the Rate of
9% Per Annum from
November 18, 2022.
10. The Foreign Judgment was
Entered November 17, 2022,
in Supreme Court State of
New York, County of
Monroe, and per New York
Law will Expire November
16, 2032.

DATED this 13th day of March, 2023.

s/
Matthew D. Green, WSBA #18046
Elizabeth Hebener Norwood, WSBA #40930
Attorneys for Plaintiff
GREEN & NORWOOD PLLC
2284 W. Commodore Way, Suite 300
Seattle, WA 98199
Telephone: (206) 420-3486
Email: matt@gnlawseattle.com
elizabeth@gnlawseattle.com

FOREIGN JUDGMENT SUMMARY - 2

Green & Norwood PLLC
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7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 SPARTAN BUSINESS SOLUTIONS, LLC
9 d/b/a SPARTAN CAPITAL,

10 Plaintiff,

11 v.

12 SULLINAIR JET CENTER, LLC d/b/a
13 SULLINAIR JET CENTER; SOLEADOS
14 ESTATES, LLC; PASCO FBO PARTNERS,
15 LLC; ASI ES LA VIDA, LLC; CAPITAL
16 STRATEGIES & DEVELOPING, LLC;
17 RENTAFLEET, LLC; and JOHN A. SULLINS,

18 Defendants.

NO. 23-2-04552-1 SEA

DECLARATION OF MAILING
NOTICE OF FILING OF FOREIGN
JUDGMENT

19 I, Matthew D. Green, declares and says:

20 1. I am an attorney for plaintiff above-named and have personal knowledge of the
21 matters herein.

22 2. On March 14, 2023, the undersigned caused to be mailed to the defendants
23 above-named, the attached Notice and Declaration of Filing of Foreign Judgment to the address
24 set forth therein.
25

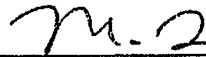
DECLARATION OF MAILING NOTICE OF FILING OF FOREIGN
JUDGMENT - 1

Green & Norwood PLLC
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Seattle, Washington 98199
(206) 420-3486

2178-101

1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 Signed at Seattle, Washington, this 13th day of March, 2023.

4 
5 _____
Matthew D. Green

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DECLARATION OF MAILING NOTICE OF FILING OF FOREIGN
JUDGMENT - 2

Green & Norwood PLLC
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RECEIVED
KING COUNTY WASHINGTON

APR 03 2023

DEPARTMENT OF
JUDICIAL ADMINISTRATION

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SPARTAN BUSINESS SOLUTIONS, LLC
d/b/a SPARTAN CAPITAL,

Plaintiff,

v.

SULLINAIR JET CENTER, LLC d/b/a
SULLINAIR JET CENTER; SOLEADOS
ESTATES, LLC; PASCO FBO PARTNERS,
LLC; ASI ES LA VIDA, LLC; CAPITAL
STRATEGIES & DEVELOPING, LLC;
RENTAFLEET, LLC; and JOHN A. SULLINS,

Defendants,

v.

NUMERICA CU,

Garnishee.

NO. 23-2-04552-1 SEA

APPLICATION FOR WRIT OF
GARNISHMENT

☒ NOT A CONSUMER DEBT
JUDGMENT

☐ This garnishment is based on a judgment
or order for:

☐ child support

☐ private student loan debt

☐ consumer debt

The undersigned states:

Submitted herewith is the fee provided by RCW 36.18.020 [RCW 3.62.060 – if District
Court] payable to the Clerk of the above-entitled Court:

As attorney for the **Judgment Creditor/plaintiff** in the above-caption action, I make
this application for a Writ of Garnishment on **Judgment Creditor's** behalf.

The facts are stated as follows:

1. **Judgment Creditor** has a judgment wholly or partially unsatisfied, against the
Judgment Debtors/defendants above named, entered on November 17, 2022, in Monroe

APPLICATION FOR WRIT OF GARNISHMENT - 1

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

2178-101

EXHIBIT "B"
COPY

1 County, Supreme Court, State of New York, and domesticated and entered in the above-
entitled Court on March 13, 2023. **Judgment Debtors** have:

- 2 ☒ made no payments whatsoever.
3 ☐ made partial payments as follows:

4 2. The amount alleged to be due and still owing under said judgment is
\$40,172.65, plus interest, attorney's fees and costs.

5 3. **Judgment Creditor** has reason to believe and does believe, that the above-
6 named **Garnishee**, whose residence and/or business address in King County, Washington, is:

7 ☒ indebted to the **Judgment Debtors** in amounts exceeding those
exempted from garnishment by any state or federal law;

8 ☒ has possession or control of personal property or effects belonging to the
9 **Judgment Debtors** which are not exempted from garnishment by any state or federal law.

10 4. The above-named Garnishee is believed to be:

- 11 ☐ the employer of the **Judgment Debtors**.
12 ☒ not the employer of the **Judgment Debtors**.

13 The undersigned certifies under penalty of perjury under the laws of the State of
Washington that the foregoing is true and correct.

14 Dated: April 3, 2023.

15 Place: Seattle, Washington

s/Matthew D. Green, WSBA #18046
Elizabeth Hebener Norwood, WSBA #40930
Attorneys for Judgment Creditor
GREEN & NORWOOD PLLC
2284 W. Commodore Way, Suite 300
Seattle, WA 98199
Telephone: (206) 420-3486
Email: matt@gnlawseattle.com
elizabeth@gnlawseattle.com

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25 APPLICATION FOR WRIT OF GARNISHMENT - 2

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SPARTAN BUSINESS SOLUTIONS, LLC
d/b/a SPARTAN CAPITAL,

Plaintiff,

v.

SULLINAIR JET CENTER, LLC d/b/a
SULLINAIR JET CENTER; SOLEADOS
ESTATES, LLC; PASCO FBO PARTNERS,
LLC; ASI ES LA VIDA, LLC; CAPITAL
STRATEGIES & DEVELOPING, LLC;
RENTAFLEET, LLC; and JOHN A. SULLINS,

Defendants,

v.

NUMERICA CU,

Garnishee.

NO. 23-2-04552-1 SEA

WRIT OF GARNISHMENT

(Clerk's Action Required)

☒ **NOT A CONSUMER DEBT
JUDGMENT**

☐ This garnishment is based on a judgment
or order for:

- ☐ child support
- ☐ private student loan debt
- ☐ consumer debt

THE STATE OF WASHINGTON TO: NUMERICA CU ("Garnishee")

AND TO: **JOHN A. SULLINS; SOLEADOS ESTATES, LLC; ASI ES LA VIDA, LLC;
CAPITAL STRATEGIES & DEVELOPING, LLC; and RENTAFLEET,
LLC (collectively "Judgment Debtors")**

Judgment Creditor in the above-captioned action has applied for a Writ of
Garnishment ("Writ") against you, claiming that the above-named **Judgment Debtors** are
indebted to **Judgment Creditor** and that the amount to be held to satisfy that indebtedness is
\$42,126.41, consisting of:

Balance of Judgment:

\$40,172.65

WRIT OF GARNISHMENT - 1

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

2178-101

EXHIBIT "C"

1 Interest under Judgment @ 9% (\$9.91/diem) from 11/18/22 to \$1,347.76
2 3/27/23:

3 Taxable Costs and Attorneys' Fees: \$240.00

4 Estimated Garnishment Costs:

Filing and Ex Parte Fees: \$26.00

5 Postage and Costs of Certified Mail: \$10.00

6 Answer Fee or Fees: \$20.00

Clerk's Trust Check Fee: \$10.00

Garnishment Attorney Fees: \$300.00

7 [Greater of \$100 or
10% not to exceed \$300]

8 Total estimated garnishment costs: \$366.00

9
10
11 ****Updated 7/2021**** YOU ARE COMMANDED, unless otherwise directed by the court, by the
12 attorney of record for the Judgment Creditor, or by this writ, not to pay any debt, other than
13 earnings, owed to the Judgment Debtors at the time this writ was served and not to deliver,
14 sell, or transfer, or recognize any sale or transfer of, any personal property or effects of the
Debtors in your possession or control at the time when this writ was served. Any such
payment delivery, sale, or transfer is void to the extent necessary to satisfy the Judgment
Creditor's claim and costs for this writ, with interest.

15 YOU ARE ALSO COMMANDED to answer this writ according to the instructions in this writ
16 and in the answer forms and, within 20 days after the service of the writ upon you, to mail or
17 deliver the original of such answer to the court, one copy to the Judgment Creditor or the
Judgment Creditor's attorney, and one copy to the Debtors, at the addresses listed at the
bottom of this writ.

18 If you owe the Debtors a debt payable in money in excess of the amount set forth in the first
19 paragraph of this writ, hold only the amount set forth in the first paragraph, and any processing
fee if one is charged, and release all additional funds or property to Debtors.

20 **FOR ALL DEBTS EXCEPT PRIVATE STUDENT LOAN DEBT AND CONSUMER DEBT:**

21 If you are a bank or other institution in which the Debtors has accounts to which the exemption
22 under RCW 6.15.010(1)(d)(ii)(A) applies, and the total of the amounts held in all the Debtors'
23 accounts is less than or equal to \$500, release all funds or property to the Debtors and do not
hold any amount.

24 If you are a bank or other institution in which the Debtors has accounts to which the exemption
25 under RCW 6.15.010(1)(d)(ii)(A) applies, and the total of the amounts held in all the Debtors'
accounts is in excess of \$500, release at least \$500, hold no more than the amount set forth in

WRIT OF GARNISHMENT - 2

Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

2178-101

1 the first paragraph of this writ, and any processing fee if one is charged, and release additional
2 funds or property, if any, to the Debtors.

3 **FOR PRIVATE STUDENT LOAN DEBT AND CONSUMER DEBT:**

4 If you are a bank or other institution in which the Debtors has accounts to which the exemption
5 under RCW 6.15.010(1)(d)(ii)(B) or (C) applies, and the total of the amounts held in all the
Debtors' accounts is less than or equal to \$1,000, release all funds or property to the Debtors
and do not hold any amount.

6 If you are a bank or other institution in which the Debtors has accounts to which the exemption
7 under RCW 6.15.010(1)(d)(ii)(B) or (C) applies, and the total of the amounts held in all the
8 Debtors' accounts is in excess of \$1,000, release at least \$1,000, hold no more than the
amount set forth in the first paragraph of this writ, and any processing fee if one is charged,
and release additional funds or property, if any, to the Debtors.

9 IF YOU FAIL TO ANSWER THIS WRIT AS COMMANDED, A JUDGMENT MAY BE
10 ENTERED AGAINST YOU FOR THE FULL AMOUNT OF THE JUDGMENT CREDITOR'S
CLAIM AGAINST THE DEBTORS WITH ACCRUING INTEREST, ATTORNEY FEES, AND
11 COSTS, WHETHER OR NOT YOU OWE ANYTHING TO THE DEBTORS. IF YOU
PROPERLY ANSWER THIS WRIT, ANY JUDGMENT AGAINST YOU WILL NOT EXCEED
12 THE AMOUNT OF ANY NONEXEMPT DEBT OR THE VALUE OF ANY NONEXEMPT
PROPERTY OR EFFECTS IN YOUR POSSESSION OR CONTROL.

13 JUDGMENT MAY ALSO BE ENTERED AGAINST THE DEBTORS FOR COSTS AND FEES
14 INCURRED BY THE JUDGMENT CREDITOR.

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WRIT OF GARNISHMENT - 3

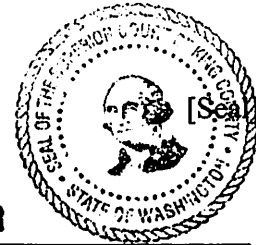
Green & Norwood PLLC
2284 W. Commodore Way, Suite 300
Seattle, Washington 98199
(206) 420-3486

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PATRICK H. OISHI

Witness, the Honorable _____, Judge of the above-entitled Court, and the
seal thereof, this ____ day of **APR 03 2023**, _____.



s/
Matthew D. Green, WSBA #18046
Elizabeth Hebener Norwood, WSBA #40930
Attorneys for Judgment Creditor
GREEN & NORWOOD PLLC
2284 W. Commodore Way, Suite 300
Seattle, WA 98199
Telephone: (206) 420-3486
Email: matt@gnlawseattle.com
elizabeth@gnlawseattle.com

BARBARA MINER
Clerk of the King County Superior Court

By **B. TEMBREULL**

Address:
King County Superior Court
516 Third Avenue, Room C-203
Seattle, WA 98104

Names & Addresses of Judgment Debtors:
John A. Sullins; Soleados Estates, LLC; ASI ES La Vida, LLC; Capital Strategies &
Developing, LLC; and Rentafleet, LLC
93006 East Chelsea Road
Kennewick, WA 99338
3702 North Stearman Avenue
Pasco, WA 99301

WRIT OF GARNISHMENT - 4

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7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 SPARTAN BUSINESS SOLUTIONS, LLC
9 d/b/a SPARTAN CAPITAL,

10 Plaintiff,

11 v.

12 SULLINAIR JET CENTER, LLC d/b/a
13 SULLINAIR JET CENTER; SOLEADOS
14 ESTATES, LLC; PASCO FBO PARTNERS,
15 LLC; ASI ES LA VIDA, LLC; CAPITAL
16 STRATEGIES & DEVELOPING, LLC;
17 RENTAFLEET, LLC; and JOHN A. SULLINS,

18 Defendants.

NO. 23-2-04552-1 SEA

RECORDS SUBPOENA IN A CIVIL
CASE

17 TO: NUMERICA CU

18 AND TO: ALL PARTIES OF RECORD IN THE ABOVE CAPTIONED CASE

19 ☒ **YOU ARE COMMANDED** pursuant to CR 45 to produce the following
20 documents or tangible things to Matthew D. Green and Elizabeth Hebener Norwood at Green
21 & Norwood PLLC, 2284 W. Commodore Way, Suite 300, Seattle, WA 98199 on Friday, April
22 28, 2023, as specified below:
23
24
25

RECORDS SUBPOENA IN A CIVIL CASE - I

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EXHIBIT "D"

1 1. Copies of all monthly statements for your customers John A. Sullins; Soleados
2 Estates, LLC; ASI ES La Vida, LLC; Capital Strategies & Developing, LLC; and Rentafleet,
3 LLC, covering the time period January 1, 2022, to the present, whose:

4 Account Number(s) include (but not limited to): Unknown

5 Social Security number is believed to be: 531-98-3824

6 Date of Birth is believed to be: 6/___/1971

7 Tax ID Numbers are believed to be: 87-1285552 and Others

8 Last Known Addresses are believed to be: 93006 East Chelsea Road
9 Kennewick, WA 99338

10 3702 North Stearman Avenue
11 Pasco, WA 99301

12 2. Copies of all signature cards for each account identified under Section 1 above.

13 3. Copies of any and all documents identifying assets claimed to be owned by your
14 customers identified in Section 1 including but not limited to, loan applications, financial
15 statements, credit applications, tax returns, etc.

16 HEREIN FAIL NOT AT YOUR PERIL

17 DATED this 3rd day of April, 2023.

18 
s/Matthew D. Green, WSBA #18046

19 Elizabeth Hebener Norwood, WSBA #40930

20 *Attorneys for Plaintiff*

21 GREEN & NORWOOD PLLC

22 2284 W. Commodore Way, Suite 300

23 Seattle, WA 98199

24 Telephone: (206) 420-3486

25 Email: matt@gnlawseattle.com

elizabeth@gnlawseattle.com

Pursuant to CR 45, a recitation of Sections (c) and (d) follows:

(c) **Protection of Persons Subject to Subpoenas.**

RECORDS SUBPOENA IN A CIVIL CASE - 2

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1 (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to
2 avoid imposing undue burden or expense on a person subject to that subpoena. The Court shall enforce this duty
3 and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not
4 limited to, lost earnings and a reasonable attorney's fee.

5 (2)(A) A person commanded to produce and permit inspection and copying of designated books, papers,
6 documents or tangible things, or inspection of premises need not appear in person at the place of production or
7 inspection unless commanded to appear for deposition, hearing or trial.

8 (B) Subject to subsection (d)(2) of this rule, a person commanded to produce and permit inspection and copying
9 may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than
10 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection
11 or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the
12 subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order
13 of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may,
14 upon notice to the person commanded to produce and all other parties, move at any time for an order to compel
15 the production. Such an order to compel production shall protect any person who is not a party or an officer of a
16 party from significant expense resulting from the inspection and copying commanded.

17 (3)(A) On timely motion, the Court by which a subpoena was issued shall quash or modify the subpoena if it:

18 (i) fails to allow reasonable time for compliance;

19 (ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this rule:

20 (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

21 (iv) subjects a person to undue burden, provided that, the Court may condition denial of the motion upon a
22 requirement that the subpoenaing party advance the reasonable cost of producing the books, papers, documents, or
23 tangible things.

24 (B) If a subpoena

25 (i) requires disclosure of a trade secret or other confidential research, development, or commercial
information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or
occurrences in dispute and resulting from the expert's study made not at the request of any party, the Court may,
to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose
behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met
without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably
compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual
course of business or shall organize and label them to correspond with the categories in the demand.

RECORDS SUBPOENA IN A CIVIL CASE - 3

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(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

PROOF OF SERVICE

NAME OF PERSON SERVED	MANNER OF SERVICE
PLACE OF SERVICE	DATE OF SERVICE
TITLE OF PERSON SERVED (IF SERVICE IS UPON BUSINESS OR ORGANIZATION)	
SERVED BY (PRINT NAME)	TITLE OF PERSON SERVING

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the State of Washington that I am a suitable person over the age of 18 and that the foregoing information contained in the Proof of Service is true and correct.

EXECUTED ON THE DATE OF	PLACE
SIGNATURE OF SERVER	
PRINTED NAME AND ADDRESS OF SERVER	PHONE

RECORDS SUBPOENA IN A CIVIL CASE - 4

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DAMAGES AND ATTORNEY FEES

DAMAGES:

Damagages for violation of the automatic stay:

16 incidents x \$1,000/ incident = \$16,000.00

ATTORNEY FEES:

1 hrs research

8 hrs motion preparation

1 hr hearing preparation/hearing

Total: 10 hours

10 hours x \$500/hr = \$5,000.00

EXHIBIT “E”